

# EXHIBIT A

UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA

AF HOLDINGS, LLC,

Civil Action No. 1:12-CV-03542-TWT

Plaintiff,

v.

HOWARD ROBINSON,

Defendant.

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**DECLARATION OF JACQUES NAZAIRE  
IN SUPPORT OF PLAINTIFF'S MOTION FOR ENTRY OF DEFAULT JUDGMENT  
AGAINST DEFENDANT HOWARD ROBINSON**

I, Jacques Nazaire, declare as follows:

1. I am an attorney at law licensed to practice in Georgia, and admitted in the Northern District of Georgia. My business address is 125 Town Park Drive, Suite 300, Kennesaw, Georgia 30144.

2. I am counsel of record for Plaintiff in this matter. Plaintiff has brought this action against Defendant for infringing upon Plaintiff's copyrighted work, "Sexual Obsession", and for contributing to the direct infringement of that copyrighted work by numerous other individuals.

3. A summons was issued to Defendant informing him of this lawsuit and explaining that if he failed to respond with an answer or motion within 21 days, judgment by default will be entered against him. Plaintiff served Defendant with the summons and complaint through personal service on January 9, 2013.

4. By January 30, 2013, Defendant had not responded to Plaintiff's complaint. On February 27, 2013, Plaintiff filed a request for the Clerk of Court to enter default against Defendant on the ground that he failed to appear or otherwise respond to Plaintiff's Complaint within the prescribed time. The Clerk of Court entered default as to Defendant on February 28,

2013. As of the date listed on this declaration, Defendant has not appeared or otherwise responded to Plaintiff's Complaint.

5. I spent a total of 8 hours in prosecution of this case against Defendant, including preparing and drafting this motion default judgment. I charge a fee of \$300 per hour for my legal services. This totals \$2400 for attorney's fees accrued litigating this case against Defendant.

6. I have incurred \$434.88 in fees in prosecution of this case against Defendant. Specifically, I spent \$350 for the filing fee to bring this action. I spent \$84.88 to personally serve Defendant.

7. I declare under penalty of perjury that the foregoing is true and correct based on my own personal knowledge, except for those matters stated on information and belief, and those matters I believe to be true. If called upon to testify, I can and will competently testify as set forth above.

**DATED: March 1, 2013**

By: /s/ Jacques Nazaire